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October 21, 2024

Via CM/ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York

MEMO ENDORSED

Re: Wahab vs. Best Vacuum and Appliances, LLC
Case #: 1:24-cv-04207-KPF

Dear Judge Failla:

This firm represents the Plaintiff in the above-referenced matter. We write in response to the Court's request for joint letter and proposed case management plan on this matter. Plaintiff has been unable to complete service of the Summons and Complaint on the Defendant although numerous attempts have been made. Plaintiff requests that the Court extend the time to complete service sixty (60) days to December 3, 2024 so that the Plaintiff can continue its efforts to serve the Summons and Complaint as new locations have been found to be possible addresses for the defendant. In addition, Plaintiff also requests that the Initial Pretrial Conference currently scheduled for October 23, 2024 also be adjourned sixty (60) days. This is Plaintiff's second request to adjourn both dates.

We thank Your Honor and the Court for its kind consideration and courtesies.

Respectfully submitted,

s/ Rami Salim

Rami Salim, Esq.

The application for an extension of the deadline to complete service is GRANTED *nunc pro tunc*. Plaintiff shall serve the summons and complaint on or before **December 3, 2024**.

Furthermore, the initial pretrial conference currently scheduled for October 25, 2024, is hereby ADJOURNED to **December 27, 2024**, at **12:00 p.m.** As before, the conference will be telephonic.

The Clerk of Court is directed to terminate the pending motion at docket entry 8.

Dated: October 21, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE